The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

BARBARA DANIEL, individually,

Plaintiff,

v.

THE BOEING COMPANY, a foreign corporation; VICKI KNIGHTON; and JOHN AND JANE DOES 1-5,

Defendants.

Case No. 2:09-CV-00890 RSL

DECLARATION OF VICKI KNIGHTON IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR: AUGUST 27, 2010

I, VICKI KNIGHTON, hereby declare and state as follows:

1. I am over eighteen years of age and competent to testify to the facts set forth in this declaration.

2. I am one of the defendants in this matter and I have personal knowledge of the facts below.

3. I currently work for The Boeing Company ("Boeing") as a Senior Manager in the Materials Management organization in Renton, Washington. I have been a Senior Manager since 2006.

4. As a Senior Manager, I have other managers who report to me. From 2007 until April of 2010, Ms. Costa was the second shift manager in Materials Management under my supervision.

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5. I am familiar with the Plaintiff in this action, Barbara Daniel. She was a second shift employee working under Ms. Costa until April of 2009, when she was transferred to Everett. At least during the time she worked at Renton under Ms. Costa's supervision, Ms. Daniel was an MPRF.

6. As an MPRF, Ms. Daniel worked primarily as an expeditor, which involves retrieving parts for the airplane mechanics from different parts of the facility. Expeditors generally spend a large part of their day walking to retrieve parts. I don't recall seeing Ms. Daniel's Job Analysis, but I believe that MPRFs are generally required to walk what Boeing defines as "Frequently," that is 3-6 hours per shift.

7. I had very little contact with Ms. Daniel while she was working in Renton. My contact was limited to saying hello if I passed her at work, and speaking to her along with many other employees during team meetings. I also attended one or two meetings regarding her medical restrictions, at the request of her manager and of Sherri Wilson from Disabilities Management.

8. Boeing's Renton and Everett sites are considered to be part of the Puget Sound Region. Union employees are frequently moved between sites in the Puget Sound Region depending on the needs of the different facilities.

9. It is a common practice at Boeing to rotate employees, and managers are responsible for making sure that their employees are trained in all of the aspects of their jobs. Consequently, I require that managers under my supervision rotate employees through different areas regularly.

10. MPRFs are regularly rotated to different barges. No barge is considered to be easier or harder to work on than any other, and all MPRFs are expected to able to do their job on any barge. MPRFs are not allowed to choose which barge they work on.

11. Each barge serves a different part of an airplane's building cycle and requires

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gathering different parts. Thus, working on different barges increases a MPRF's job knowledge and her value to Boeing.

12. I had no part in the decision to rotate Ms. Daniel.

13. In the Spring of 2008, Boeing had to downsize and thus entered a "surplus" situation, which means that due to budgetary reasons certain job codes were required to reduce (layoff) some of their employees.

14. Procedures for doing a surplus are decided by the Skill Team for the Puget Sound Region. I had no part in the decision to transfer Ms. Daniel to Everett.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 30, 2010, at Renton, Washington

[signature]

VICKI KNIGHTON

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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2010, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Dated: August 3, 2010

s/Sally Swearinger
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